

RECEIVED
OPPT CDIC

AR201-00079

PHILLIPS PETROLEUM COMPANY
98 DEC 17 PM 2: 56 BARTLESVILLE, OKLAHOMA 74004

December 2, 1998

W. W. ALLEN
CHAIRMAN OF THE BOARD
AND CHIEF EXECUTIVE OFFICER

Ms. Carol Browner, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-to-Know Program

Dear Ms. Browner:

Phillips Petroleum Company (Phillips) acknowledges the receipt of your letter announcing the High Production Volume (HPV) Chemical Challenge Program. Phillips intends to participate in the HPV Challenge Program.

Because of the similarities among the HPV substances that the petroleum industry manufactures, the industry has been working with its Trade Associations, the American Petroleum Institute (API) and the Chemical Manufacturers Association (CMA), to develop a coordinated plan to meet the intended objectives of the program.

Member companies from the API, National Petroleum Refiners Association (NPRA), Gas Processors Association (GPA), and Asphalt Institute (AI) are currently engaged in the process of forming a consortium (the Petroleum Industry Consortium). Through this consortium, API is coordinating the petroleum industry effort to evaluate the existing data on the HPV petroleum substances, identify appropriate chemical categories, and develop a testing program to fill data gaps as appropriate. Upon completion of this effort in early 1999, the Petroleum Industry Consortium will provide a follow-up letter to EPA that will include lists of petroleum industry participants, proposed chemical categories with sponsored chemicals, and a proposed testing schedule. If you have questions about any aspects of this program, please contact Dr. Carol Henry (Tel: 202-682-8308; <mailto:Henrycj@API.org> at API and/or Dr. Fred Marashi (Tel: 918-661-8153; <mailto:fmara@ppco.com> or Dr. Gary Bond (Tel: 918-661-0597; <mailto:gpbond@ppco.com>) of my staff.

Phillips is also participating in testing of HPV substances that are not covered by the Petroleum Industry Consortium through its participation in appropriate Chemstar panels at the CMA. It is expected that in early 1999, CMA Chemstar will provide EPA with lists of HPV substances, companies that will be participating in various HPV programs, and a proposed testing schedule.

MR 13085

December 2, 1998

RECEIVED
OPPT CRIC

98 DEC 17 PM 2: 56

Page 2

Phillips will be responsible for testing of Phillips' HPV substances whose testing will not be administered through either the Petroleum Industry Consortium or CMA Chemstar HPV Panels. Prior to the publication of the proposed rule, Phillips will provide EPA with a list of this third group of substances and a proposed schedule for testing.

The information obtained through the HPV Challenge Program testing will be provided to the public in accordance with the information sharing guidelines agreed upon between EPA and the industry.

For questions ~~regarding substances being tested~~ by CMA Chemstar panels and/or independently by Phillips, please contact Dr. Marashi, TSCA Compliance Coordinator, or Dr. Bond, toxicologist, by phone or E-Mail as indicated above.

Please be advised that Phillips and Ultramar Diamond Shamrock have announced formation of a joint venture (JV) company which, if and when formed, will assume responsibility for Phillips' HPV substances included in the JV.

Sincerely,

W. W. Allen

WWA:am